

THE HONORABLE BRIAN A. TSUCHIDA

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHRISTOPHER J. HADNAGY, an individual;
and SOCIAL-ENGINEER, LLC, a
Pennsylvania limited liability company,

Plaintiffs,

v.

JEFF MOSS, an individual; DEF CON
COMMUNICATIONS, INC., a Washington
corporation; and DOES 1-10; and ROE
ENTITIES 1-10, inclusive,

Defendants.

No. 2:23-cv-01932-BAT

DECLARATION OF CHRISTOPHER
HADNAGY IN SUPPORT OF
PLAINTIFFS' RESPONSE TO
DEFENDANTS' MOTION TO SEAL

I, Christopher Hadnagy, declare under penalty of perjury under the laws of Washington
State as follows:

1. I am over the age of 18, and competent to testify to the matters set forth herein; and make
this declaration of my own personal knowledge.

2. I am one of the Plaintiffs in this case, and the CEO of Social-Engineer, LLC.

3. Social-Engineer, LLC provides security consulting services to corporations, government
agencies, and other organizations worldwide. The company operates under strict non-disclosure
agreements (NDAs) with its clients and prospective clients and does not publicly disclose client

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SUPPORT OF PLAINTIFFS' RESPONSE TO
DEFENDANTS' MOTION TO SEAL - Page 1
CASE NO.: 2:23-cv-01932-BAT

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1 identities, services rendered, or financial terms. Social-Engineer gains access to sensitive client
2 data while assessing security vulnerabilities. Public disclosure of Social-Engineer's client names
3 would pose significant security risks, exposing both the company and its clients to potential cyber
4 threats for several reasons. For example, malicious actors, upon learning which organizations work
5 or even did work with Social-Engineer—a firm specializing in security training and penetration—
6 may target Social-Engineer to gain access to sensitive client information, including potential
7 vulnerabilities..

8 4. Dkt. 89, 92, 93, and 94 contain and discuss confidential financial and business information,
9 including Social-Engineer's revenue, expenses, net income, client names, contract amounts, and
10 my salary information. We implement protective measures to ensure the security of the Company's
11 financial data, which is password-protected and not shared with the public or employees, except
12 for the CEO, COO, and the company's controller.

13 5. Public disclosure of this information would severely harm both Social-Engineer and me in
14 multiple ways. Competitors would gain unfair insight into Social-Engineer's financial
15 performance, allowing them to undercut pricing, adjust market strategies, and exploit perceived
16 weaknesses. Additionally, the disclosure of client names, contract amounts, and sales data would
17 create an unfair advantage for competitors when bidding for new client work. Competitors could
18 use this information to poach key clients, leading to increased costs and reduced profit margins.
19 Clients and competitors could also leverage the disclosed financials to negotiate less favorable
20 terms, knowing Social-Engineer's cost structures and profit margins. Because this information is
21 integral to Social-Engineer's operations, the scope of potential harm is significant and wide-
22 ranging.
23


1 6. The release of client names presents an additional threat, as Social-Engineer operates under
2 strict non-disclosure agreements (NDAs) with its clients. Disclosure could violate these
3 agreements, exposing Social-Engineer to potential legal liability. Additionally, clients may choose
4 to discontinue their relationship with the company due to these breaches of confidentiality."

5
6 7. These risks are further exacerbated by the fact that Defendant Def Con Communications is
7 well known in the global cybersecurity and hacker community, attracting both ethical hackers and
8 malicious actors. The nature of this lawsuit and the visibility of the disclosed information could
9 make Social-Engineer a prime target for security breaches. Such exposure could lead clients to
10 terminate their relationships with us due to concerns about confidentiality, jeopardizing our
11 business operations and threatening the survival of the company.

12
13 8. Public disclosure of my personal salary information would also negatively impact my
14 ability to negotiate compensation with potential future employers. My financial history is not
15 publicly available, aside from Defendants' initial filings in their exhibits to summary judgment
16 which is now sealed. Making this information public would unfairly limit my bargaining power in
17 future negotiations, as potential employers could use it to justify lower salary offers.

18
19 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF
20 WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

21 DATED this 21st day of March 2025 in Orlando, Florida.

22
23 By: 
 Christopher Hadnagy

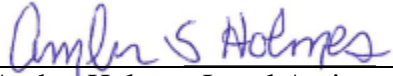
CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury according to the laws of the United States and the State of Washington that on this date I caused to be served in the manner noted below a copy of this document entitled **DECLARATION OF CHRISTOPHER HADNAGY IN SUPPORT OF PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO SEAL** on the following individuals:

David Perez, WSBA #43959
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☐ Via USPS
☒ Via Electronic Mail
☒ Via Electronic Filing (CM/ECF)

DATED this 21st day of March 2025 at Seattle, Washington.


Amber Holmes, Legal Assistant